

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

MUR 3774

**JEB HENSARLING'S  
RESPONSES TO THE FEDERAL ELECTION  
COMMISSION'S SUBPOENA**

Mar 21 3 42 PM '97

Jeb Hensarling hereby submits the following objections and responses to the Federal Election Commission's ("FEC") Subpoena to Produce Documents and Order to Submit Written Answers ("the FEC Subpoena") as follows:

**GENERAL OBJECTIONS**

The following general objections apply to each request for the production of documents and for written answers (the "Questions") accompanying the FEC Subpoena:

1. I object to the Questions to the extent that they call for the disclosure of information and/or production of documents that are protected from discovery by the attorney-client privilege or work-product immunity or are otherwise privileged. To the extent that any privileged document is or may be produced in response to the Questions, the production of any such document is inadvertent and is not to be deemed a waiver of any privilege with respect to the produced document or any other document.
2. I object to the Questions to the extent they purport to impose obligations to supplement the disclosure of information and/or the production of documents beyond those imposed by the United States Code and the Federal Rules of Civil Procedure.

3. I undertake to disclose information and produce documents in response to the Questions only in the form, and to the extent, required by 2 U.S.C. § 437d and any other applicable provisions of the United States Code or the Federal Rules of Civil Procedure. I object to each instruction, definition, question and request contained in the Questions to the extent that each instruction, definition, question and request attempts to impose obligations concerning the form or context of document production beyond those required by such provisions or exceeds the scope of investigation permitted by, or conflicts with 2 U.S.C. § 437d and any other applicable provisions of the United States Code or the Federal Rules of Civil Procedure.

4. I object to the Questions to the extent that they call for the disclosure of information or the production of documents containing proprietary information.

5. I reserve the right to modify the objections made herein or to assert additional objections to production as appropriate.

6. I reserve the right to modify, amend or supplement the answers to the Questions contained herein as further information becomes available or as otherwise appropriate.

**SPECIFIC OBJECTIONS, RESPONSES AND ANSWERS TO INTERROGATORIES**

Subject to the General Objections, and without waiving same, I hereby respond to the individual Questions as follows:

**Question No. 1**

**Identify by name and position all contact persons at the following U.S. Senate campaigns with whom you communicated in 1992:**

**Response and Answer to Question No. 1:**

**(a) Paul Coverdell's Senate campaign, including the November 3 general election campaign and the November 24 runoff.**

Paul Coverdell, Candidate; Tom Perdue, Campaign Manager; Molly Dye, Mr. Coverdell's Assistant.

**(b) Bob Kasten's Senate campaign.**

Bob Kasten, Candidate.

**(c) Mike DeWine's Senate campaign.**

Mike DeWine, Candidate; Nick Wise, Campaign Manager.

**(d) Bob Packwood's Senate campaign.**

Elaine Franklin, Campaign Director.

**(e) Lauch Faircloth's Senate campaign in 1992.**

John Preyer, Campaign Manager.

**(f) Thomas Hartnett's Senate campaign in 1992.**

Thomas Hartnett, Candidate.

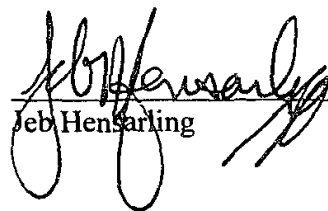
**(g) Dirk Kempthorne's Senate campaign in 1992.**

Dirk Kempthorne, Candidate; Phil Rehberger, Campaign Manager.

**SPECIFIC OBJECTIONS AND RESPONSES TO  
PRODUCTION OF DOCUMENTS REQUEST**

Subject to the General Objections stated above, and without waiving same, I hereby state that I have no documents responsive to either of the requests for production of documents (Nos. 1 and 2) within my possession, custody or control.

Respectfully submitted,

  
Jeb Hensarling

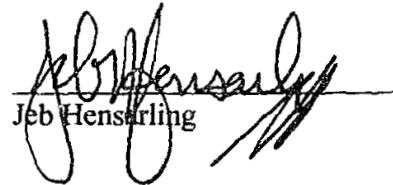
Dated: March 21, 1997

**VERIFICATION OF WRITTEN ANSWERS**

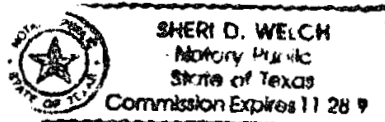
I, Jeb Hensarling, hereby declare under penalty of perjury that the foregoing Responses to the Federal Election Commission's Subpoena are true and correct to the best of my knowledge and belief.

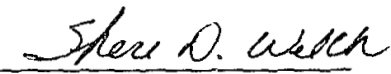
March 20, 1997

By:

  
Jeb Hensarling

Subscribed and sworn before me this 20 th day of March, 1997



  
Notary Public